

## REMARKS

In the Office Action, the Examiner rejected claims 1-35 and 57-60 under 35 USC 102. These rejections are fully traversed below.

Independent claims 1 and 9 have been amended. In particular, claim 1 was amended to include the limitations from dependent claim 2, and claim 9 was amended to include the limitations from dependent claims 10, 11 and 17. Dependent claims 2, 10, 11, and 17 have been cancelled and dependent claims 3, 12, 14-16, 18 and 19 have been amended (antecedents) in lieu of the above mentioned amendments. Thus, claims 1, 3-9, 12-16, and 18-60 are pending in the application. Reconsideration of the application is respectfully requested based on the following remarks.

The Examiner is respectfully urged to provide more extensive comments so that the Applicant can understand the reasons for the rejection. The Examiner is thanked ahead of time for providing such details in the subsequent action (if needed).

### *Claim Rejections – 35 USC 102*

**Claims 1-35 have been rejected under 35 U.S.C. 102(b) as being anticipated by *Bernd et al* (U.S. Pat. No. 5,731,541).**

In contrast to *Bernd*, claim 1 (and its dependents) specifically requires, "...a means for electrically and structurally coupling the elements of the first and second members together so as to form a singular composite structure that both supports the computing device and shields the computing device from electronic emissions." While *Bernd* may disclose housing parts 2 and 4 and a sealing element (including a base part 911 and U-shaped sealing profile 811) disposed therebetween, *Bernd* does not teach or suggest forming a composite structure with these multiple components. In *Bernd*, the housings are multi part structures which have to be capable of being opened. *Bernd* states, "The aim of the invention is therefore to provide a screening element suitable in particular for sealing screening housings which have to be repeated opened and closed...(Col.2, lines 33-35)." In fact, *Bernd* uses screws to hold the above mentioned components together. See for example, Fig. 1 and Col. 4, lines 53-56, which states, "The basic

shape of the screening frame is defined by an injection moulded plastics part 3 having bores which are provided for screwing the housing parts 2 and 4 to the frame 1." Simply put, the device shown in Fig. 1 of *Bernd* is not a single composite structure. As stated in the specification of the present invention on page 14, lines 1-4, "The binding nature of the adhesive 200 is arranged to form a singular composite structure between two disparate parts (e.g., metal top plate and plastic top frame) that is stronger than conventional fastening methods, i.e., bolts, screws, snaps, and inserts." The most that can be said is that the sealing layer 8 (or 811) of the sealing element is adhered to a surface of the screening frame 1 (or base 911) of the sealing element. The sealing layer, however, does not adhere to the housing 2 and 4 and thus it does not form a composite structure with either of the housings 2 and 4. Again, it is screws 2a that closes up the housing 4. Accordingly, the rejection is unsupported by the art and should be withdrawn. The Examiner is respectfully urged to make a showing where a composite structure is taught in *Bernd* in order to maintain the rejection.

Also in contrast to *Bernd*, claim 9 (and its dependents) specifically requires, "...a glue disposed between the casing and the frame..." and further "...the glue structurally attaching the casing and the frame to form a singular composite structure..." For one, *Bernd* does not teach or suggest a glue, but rather a seal. For another, *Bernd* does not teach or suggest a sealing layer 8 that attaches to housing parts 2 and 4. As stated above, it appears that the sealing layer 8 is only applied to the screening frame 1/plastic molded part 3. For yet another, *Bernd* does not teach or suggest forming a singular composite structure. As should be appreciated, the housing parts 2 and 4 as well as the screening frame 1 are separate structures that are closed up by means of screws 2a and thus they are not a composite structure. Accordingly, the rejection is unsupported by the art and should be withdrawn.

Also in contrast to *Bernd*, claim 20 (and its dependents) specifically requires, "...a conductive bridge electrically bonding the first and second conductive surfaces and electrically sealing an interface between the first and second conductive surfaces so as to form a singular conductive structure for shielding electronic emissions." While *Bernd* may disclose a screening frame 1 and a conductive layer 8 disposed between housing parts 2 and 4, *Bernd* does not teach or suggest a screening frame 1 and conductive layer 8 that is electrically bonded to conductive portions of the housing parts 2 and 4. In *Bernd*, the conductive layer electrically contacts the housing parts 2 and 4, but it does not electrically bond (e.g., join securely) with the housing parts 2 and 4. Electrically bonding the housing parts is opposite the aim of the invention in *Bernd*,

which is to provide a screening element suitable in particular for sealing screening housings which have to be repeatedly opened and closed (see Col. 2, lines 33-35). As should be appreciated, something that is repeatedly opened and closed is not made up of a singular conductive structure, but rather made up of multiple conductive structures. Accordingly, the rejection is unsupported by the art and should be withdrawn. The Examiner is respectfully urged to make a showing where a singular conductive structure is taught in *Bernd* in order to maintain the rejection.

Also in contrast to *Bernd*, claim 31 (and its dependents) specifically requires, "...a first case configured to at least partially enclose internal components of the portable computer..." *Bernd* is completely silent to a portable computer. Furthermore, *Bernd* does not teach or suggest "...the first member being structurally glued to the second member to form a composite structure..." *Bernd* also does not teach or suggest, "...the glue having properties that allow it to compensate for tolerances in the first and second members so as to produce a desired first case dimension..." Accordingly, the rejection is unsupported by the art and should be withdrawn.

**Claims 1-35 have been rejected under 35 U.S.C. 102(e) as being anticipated by *Tiburtius et al* (U.S. Pat. No. 6,323,418).**

In contrast to *Tiburtius*, claim 1 (and its dependents) specifically requires, "...a means for electrically and structurally coupling the elements of the first and second members together so as to form a singular composite structure that both supports the computing device and shields the computing device from electronic emissions." While *Tiburtius* may disclose lower part 2, cover 3 and a seal 4 disposed between the lower part 2 and cover 3, *Tiburtius* does not teach or suggest forming a composite structure with these multiple components. In *Tiburtius*, the housing is multi part structure, which is capable of being opened. *Tiburtius* states, "By virtue of this construction the housing is easy to open, e.g., for maintenance purposes or for changing a battery in the housing and is easily released afterwards whilst retaining the screening effect (Col. 1, 39-43)." In fact, *Tiburtius* uses screws to hold the above mentioned components together. See for example, Fig. 1 and Col. 3, lines 63-67, which states, "The cover is attached to the lower part 2 by screwing, with four screws 5.1 to 5.4 passing through corresponding bores in the corners of the cover 3 and screwed into threads on the lower part." Simply put, the devices shown in *Tiburtius* are not single composite structures. The most that can be said is that the seal 4 is attached to the lower part 2. *Tiburtius* states, "...the screening seal consists of resilient sealing

element 4 made of conventional elastic plastics material (such as unfilled silicon or neoprene) adhesively attached to the lower part 2...(Col. 4, lines 10-13)." The seal 4, however, does not adhere to the cover 3 and thus it does not form a composite structure. Again, it is screws 5.1-5.4 that attaches cover 3 to lower part 2. Accordingly, the rejection is unsupported by the art and should be withdrawn. The Examiner is respectfully urged to make a showing where a composite structure is taught in *Tiburtius* in order to maintain the rejection.

Also in contrast to *Tiburtius*, claim 9 (and its dependents) specifically requires, "...a glue disposed between the casing and the frame..." and further "...the glue structurally attaching the casing and the frame to form a singular composite structure..." For one, *Tiburtius* does not teach or suggest glue, but rather a seal 4. For another, *Tiburtius* does not teach or suggest a seal 4 that attaches to the cover 3. As stated above, it appears that the seal 4 is only applied to the lower part 2. For yet another, *Tiburtius* does not teach or suggest forming a singular composite structure. As should be appreciated, the lower part 2 and cover 3 are separate structures that are closed up by means of screws 5.1 to 5.4. Accordingly, the rejection is unsupported by the art and should be withdrawn.

Also in contrast to *Tiburtius*, claim 20 (and its dependents) specifically requires, "...a conductive bridge electrically bonding the first and second conductive surfaces and electrically sealing an interface between the first and second conductive surfaces so as to form a singular conductive structure for shielding electronic emissions." While *Tiburtius* may disclose lower part 2 with conductive coating 6.1, cover 3 with conductive coating 6.2 and a seal 4 with conductive coating 6.1a (as shown in Fig. 2a), *Tiburtius* does not teach or suggest electrically bonding the conductive coatings 6.1, 6.1a and 6.2 together. In *Tiburtius*, the conductive coating 6.2 electrically contacts the conductive coating 6.1 and 6.1a of the seal 4 and lower part 2, but it does not electrically bond (e.g., join securely) with the seal 4 or lower part 2. This particular limitation of claim 20 is opposite the teaching of the invention disclosed in *Tiburtius*, which is to provide a housing that is easy to open, e.g., for maintenance purposes or for changing a battery in the housing, and is easily resealed afterwards while retaining the screening effect (see Col. 1, lines 40-44). As should be appreciated, something that is easily opened is not made up of a singular conductive structure, but rather made up of multiple conductive structures. Accordingly, the rejection is unsupported by the art and should be withdrawn. The Examiner is

respectfully urged to make a showing where a singular conductive structure is taught in *Tiburtius* in order to maintain the rejection.

Also in contrast to *Tiburtius*, claim 31 specifically requires, "...a first case configured to at least partially enclose internal components of the portable computer..." *Tiburtius* is completely silent to a portable computer. Furthermore, *Tiburtius* does not teach or suggest "...the first member being structurally glued to the second member to form a composite structure..." No mention is made of glue or composite structures. Accordingly, the rejection is unsupported by the art and should be withdrawn.

**Claims 1-35 and 57-60 have been rejected under 35 U.S.C. 102(b) as being anticipated by *Hart* (U.S. Pat. No. 5,164,542).**

In contrast to *Hart*, claim 1 (and its dependents) specifically requires, "...a means for electrically and structurally coupling the elements of the first and second members together so as to form a singular composite structure that both supports the computing device and shields the computing device from electronic emissions." While *Hart* may disclose a connector plate 122 including flanged members 302 and 304, an outer housing part 118, and a layer of adhesive 306 that attaches the flange section 304 to the outer housing member 118 (See Col. 7, lines 59-63), *Hart* does not teach or suggest electrically coupling the connector plate 122 to the outer housing part 118. Accordingly, the rejection is unsupported by the art and should be withdrawn. The Examiner is respectfully urged to make a showing where in *Hart* such a feature is taught in order to maintain the rejection.

Also in contrast to *Hart*, claim 9 (and its dependents) specifically requires, "...a glue disposed between the casing and the frame..." and further "...the glue structurally attaching the casing and the frame to form a singular composite structure..." *Hart* does not teach or suggest glue, but rather an adhesive. While glue may generally be called an adhesive, *Hart* provides no evidence that the adhesive 306 is a glue. In fact, the only adhesive that is mentioned by *Hart* are adhesive strips used to secure brackets 152 and 154 to the outer member 118 (see Col. 6 lines 40-42). Adhesive strips, however, are not glue. Moreover, *Hart* does not teach or suggest "the glue being arranged to absorb geometric variations found in the frame or casing so as to meet a predetermined geometry of the component, the casing and the frame being arranged to provide a gap therebetween for the placement of the glue, the glue conforming to the gap to reduce"

tolerance variability in the glued component” as required by claim 9. Accordingly, the rejection is unsupported by the art and should be withdrawn.

Also in contrast to *Hart*, claim 20 (and its dependents) specifically requires, “...a conductive bridge electrically bonding the first and second conductive surfaces and electrically sealing an interface between the first and second conductive surfaces so as to form a singular conductive structure for shielding electronic emissions.” While *Hart* may disclose a connector plate 122 formed from aluminum or steel (See Col. 7, lines 65-66), *Hart* does not teach or suggest an outer housing member 118 with a conductive surface that is electrically bonded to the connector plate 122. Therefore, *Hart* simply does not disclose forming a singular conductive structure for shielding electronic emissions. In fact, *Hart* appears to be completely silent about electrically sealing the interface between the connector plate 122 and the outer housing member 118. Accordingly, the rejection is unsupported by the art and should be withdrawn.

Also in contrast to *Hart*, claim 31 specifically requires, “...the first member being structurally glued to the second member to form a composite structure...” and “...the glue having properties that allow it to compensate for tolerances in the first and second members so as to produce a desired first case dimension. *Hart* does not teach glue and further does not teach compensating for tolerances in the connector plate 122 and outer housing member 118. As should be appreciated, the present invention teaches, “the adhesive (glue) offers a dynamic way to place multiple parts in desired positions relative to one another and a static way to fix the multiple parts together (See page 16, lines 1-2). Accordingly, the rejection is unsupported by the art and should be withdrawn.

Also in contrast to *Hart*, claim 57 specifically requires, “...a second conductive portion...” and “...a joint configured to electrically bond the first and second conductive portions together...” Again, while *Hart* may disclose a connector plate 122 formed from aluminum or steel (See Col. 7, lines 65-66), *Hart* does not teach or suggest an outer housing member 118 with a conductive surface or a joint that electrically bonds the connector plate 122 to the outer housing member 118. Accordingly, the rejection is unsupported by the art and should be withdrawn.

**Claims 57-60 have been rejected under 35 U.S.C. 102(b) as being anticipated by Terakawa (U.S. Pat. No. 5,008,486).**

In contrast to *Terakawa*, claim 57 (and its dependents) specifically requires, "...a computing device..." *Terakawa* does not disclose a computing device. *Terakawa* is directed at electromagnetic wave shielding panels and wall structure which are suitable for use in forming electromagnetic wave shielding rooms. Shielding rooms are simply not computing devices, i.e., rooms and devices are not the same thing. Furthermore, *Terakawa* does not teach or suggest, "a joint configured to electrically bond the first and second conductive portions together..." as required by claim 57. While *Terakawa* may disclose shielding panels with adjacent surfaces abutted against each other with their fringe portions sandwiched therebetween, *Terakawa* does not teach or suggest electrically bonding the fringe portions together. In *Terakawa*, the fringe portions of metal nets 2 are electrically connected by being sandwiched between the shielding panels 1. This may be performed using several techniques as shown in Figs. 2-7. Sandwiching, however, is not bonding. In fact, *Terakawa* teaches away from bonding when its stated, "As described above, an electromagnetic wave shielding panel and wall structure according to the present invention uses both an electrically conductive foil and net on its plate member, thereby permitting necessary electrical connection to be made using its net fringe portion, thus eliminating the necessity of soldering adjacent edges of the copper foils of adjacent panels as is the case with a conventional electromagnetic wave shielding panel, according reducing the manufacturing cost (Col. 3, lines 57-67)." In the present invention, the binding nature of the electrical bond is arranged to form a singular electrical structure. By way of example, the electrical bond may be from a conductive paste that exhibits good adhesion between the conductive surfaces (See generally page 16 lines 11-12 and lines 25-27). Accordingly, the rejection is unsupported by the art and should be withdrawn.

Although the rejections to the dependent claims 58-60 should be withdrawn for at least the reasons as above, it should be noted that they offer additional language that is unsupported by the art. For example, claim 59 specifically requires, "wherein the first and second conductive portions are bonded together in order to form a singular conductive structure for shielding electronic emissions and claim 60 specifically requires, "wherein the first and second structural members are attached together in order to form a single composite structure for housing at least a portion of the computing device." *Terakawa* simply does not teach or suggest a singular conductive structure or a singular composite structure. As should be appreciated, the fringe

portions contact each other, but they are not bonded together to form a singular conductive structure. Furthermore, the shielding plates are connected using wedges and the like and thus they do not form a singular composite structure, uses a fastening mechanism similar to screws.

### **Dependent claims**

Although the rejections to the dependent claims 3-8, 12-16, 18, 19, 21-30, 32-35 and 58-60 should be withdrawn for at least the reasons as above, it should be noted that they offer additional language that is unsupported by the art. For example, none of the references teach or suggest, "...wherein the means has a liquid state for flowing between the first and second members and a solid state for permanently attaching itself to the first and second members." as required by claim 4, and "...wherein the means includes a structural glue and a conductive paste" as required by claim 5.

The references additionally do not teach or suggest, "wherein the glue is a two part epoxy" as required by claim 13, "...wherein the conductive bridge is a conductive paste..." as required by claim 21, "...wherein the conductive paste is a metal filled electrically conductive ink..." as required by claims 23, "...wherein the plastic material is a carbon fiber plastic, the second metallic material is a nickel plated layer, and the metallic material is titanium sheet metal..." as required by 27, and "wherein the conductive bridge is formed from a nickel filled electrically conductive ink" as required by claim 28.

Moreover, the references do not teach or suggest, "the second member being formed from a non-conductive material that is coated with a second conductive material that is different than the first conductive material..." as required by claim 32, "a second case...the third member being glued to the fourth member to form a second composite structure..." as required by claim 33, "wherein the first and second conductive portions are bonded together in order to form a singular conductive structure for shielding electronic emissions" as required by claim 59 and "wherein the first and second structural members are attached together in order to form a single composite structure for housing at least a portion of the computing device" as required by claim 60.

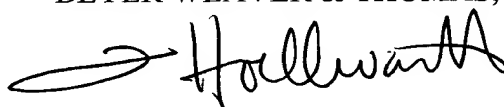


SUMMARY

Applicant believes that all pending claims are allowable and respectfully requests a Notice of Allowance for this application from the Examiner. Should the Examiner believe that a telephone conference would expedite the prosecution of this application, the undersigned can be reached at the telephone number set out below.

Respectfully submitted,

BEYER WEAVER & THOMAS, LLP

A handwritten signature in black ink, appearing to read "Hoellwarth", with a stylized flourish to the left.

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## APPENDIX

1. (Once Amended) A computing device, comprising:
  - a first member having a first structural element and a first conductive element;
  - a second member having a second structural element and a second conductive element;and
  - a means for electrically and structurally coupling the elements of the first and second members together so as to form a singular composite structure that both supports the computing device and shields the computing device from electronic emissions.
3. (Once Amended) The computing device as recited in claim [2] 1 wherein the singular composite structure is used to enclose internal components of the computing device.
9. (Once Amended) A component of a computer enclosure, comprising:
  - a casing [first structural member];
  - a frame for supporting the casing, the casing and the frame being configured to at least partially enclose parts of a computing device [second structural member];
  - a glue [an adhesive] disposed between the casing and the frame [first and second members], the glue [adhesive] structurally attaching the casing and the frame [first and second members] to form a singular composite structure, the glue being arranged to absorb geometric variations found in the frame or casing so as to meet a predetermined geometry of the component, the casing and the frame being arranged to provide a gap therebetween for the placement of the glue, the glue conforming to the gap to reduce tolerance variability in the glued component.
12. (Once Amended) The component as recited in claim [11] 2 wherein the glue has a compliant state arranged for filling the gap, and wherein the glue has a rigid state for structurally binding the first and second members together.
14. (Once Amended) The component as recited in claim 9 wherein the [adhesive] glue substantially eliminates the use of mechanical fasteners, which are used to attach the first and second members.

15. (Once Amended) The component as recited in claim 9 wherein the **[first member]** **casing** is formed from a first material, and wherein the **[second member]** **frame** is formed from a second material that is different than the first material.

16. (Once Amended) The component as recited in claim 9 wherein the **[first member]** **casing** is formed from a plastic material, and wherein the **[second member]** **frame** is formed from a metallic material.

18. (Once Amended) The component as recited in claim 9 wherein a first surface of the **[first member]** **casing** is configured to be flush with a second surface of the **[second member]** **frame**.

19. (Once Amended) The component as recited in claim 9 wherein a first surface of the **[first member]** **casing** is configured to be offset from a second surface of the **[second member]** **frame**.